



## City of Seattle

Department of Planning and Development  
D. M. Sugimura, Director

### CITY OF SEATTLE ANALYSIS AND RECOMMENDATION OF THE DIRECTOR OF THE DEPARTMENT OF PLANNING AND DEVELOPMENT

**Application Number:** 3012845 and 3013107

**Council File Number:** CF #312119

**Applicant Name:** Dan Miles for Seattle Department of Parks and Recreation

**Address of Proposal:** 4101 and 4100 Beacon Avenue South

#### **SUMMARY OF PROPOSED ACTION**

Council Land Use Action to allow a new 19,800 sq. ft. two-story clubhouse and driving range structure (Jefferson Park Golf Course). Project includes new field lighting up to 90 ft. in height, netting/net poles up to 140 ft. in height, and 63 additional surface parking spaces for a total of 80 parking spaces. Existing clubhouse and driving structures to be demolished. Review includes a 4,100 sq. ft. single-story cart storage structure and 20,000 sq. ft. of paving improvements located on the east side of Beacon Avenue South (DPD #3013107: 4100 Beacon Avenue South). Determination of Non-Significance prepared by the Seattle Parks & Recreation.

The following approvals are required:

**Council Land Use Action** – Council Concept Approval to waive or modify development standards for a City facility (SMC Sections 23.44.036 and 23.51A.002):

- to allow additional height for driving range netting (30 feet required, 140 feet maximum proposed)
- to allow additional height for field lighting in a single-family zone (30 feet required; 90 feet maximum proposed);
- to allow an existing driveway to remain at less than the required width (22 feet required, 17'-11" proposed); and
- to allow an existing curbcut to remain at greater than the required width (25 feet required, 38'-5" proposed); and,

**Special Exception** - to permit structures to exceed the height limit of the Airport Height Overlay District (SMC 23.64).

**SEPA – to impose conditions** – (Chapter 25.05, Seattle Municipal Code.)

**SEPA DETERMINATION:** [ ] Exempt [X] DNS\* [ ] MDNS [ ] EIS

[ ] DNS w/ conditions [ ] DNS w/ non exempt grading, demolition or involving another agency with jurisdiction.

## **BACKGROUND INFORMATION**

### **Site and Vicinity Description**

The project site is the Jefferson Park Golf Course located in the Beacon Hill neighborhood of Seattle. The site includes property east and west of Beacon Ave. S., which bisects the site, and is bounded by 16<sup>th</sup> Avenue S. on the west, S. Spokane St. on the north and property lines on the east and south. Beacon Ave. S. is paved and improved with sidewalks, curbs, gutters and a parking median with angled parking.



Almost the entire site, including all of the area of the proposed work, is located in a Single Family zone (SF 5000). There is a strip of Lowrise 1 multifamily zoning (LR1) along the northwest corner of the site, but no work is proposed for that area. Most of the surrounding zoning is Single Family, but there are also areas of Lowrise multifamily (LR1 and LR2) to the north and west. The zoning changes to Multi-family Residential zones (MR, LR3, and LR2) within a Major Institution Overlay to the southeast. A small Neighborhood Commercial zone (NC1-40) is located to the southwest. The site is also located within the Airport Height Overlay District (AHOD).

Asa Mercer Middle School abuts the property to the south, and the Veteran's Administration Medical Center abuts to the southeast. Other nearby development consists of primarily single family residential, with some multi-family and some commercial structures.

Portions of the site are mapped as the following Environmentally Critical Areas (ECAs): Steep Slope, Known Slides, Wetland, and Fish and Wildlife. However, no work is proposed to occur in any of these ECAs and the project has been exempted from ECA review by DPD staff.

The project site is currently developed with the 18-hole Jefferson Park Golf Course, a nine-hole course, a driving range, a clubhouse, a cart barn and accessory parking.

In 2004, the Seattle City Council approved poles for netting to enclose the existing driving range at Jefferson Park up to a maximum height of 115 feet (MUP No. 2401708, C.F. 306872). The sole condition attached to the approval was the requirement for a current *Determination of No Hazard to Air Navigation from the FAA* to be submitted to DPD prior to issuance of applicable construction permits.

Department of Neighborhoods administers historic preservation issues in the City of Seattle. The DON's Landmark Preservation Board denied the nomination of the Jefferson Park Golf Clubhouse on February 15, 2012.

## Proposal

Seattle Parks and Recreation proposes to demolish the existing 7,200 sq. ft. clubhouse and 3,800 sq. ft. driving range structures and construct a new 10,800 sq. ft. two-story clubhouse with an enlarged restaurant and expanded banquet facilities, a new 9,000 sq. ft. two-story driving range structure, and a new 4,100 sq. ft. golf cart storage building. The existing golf cart storage area ("cart barn") is located west of Beacon Ave. S., and the proposed cart barn is to be located east of Beacon Ave. S. in closer proximity to the 18-hole golf course. The proposal includes replacement of 17 existing off-street parking spaces with 72 new parking spaces (for a total of 72 spaces, according to the plans). In addition, 20,000 sq. ft. of existing gravel surfaced cart paths will be resurfaced with asphalt paving. The proposal also includes increasing the height of the netting poles and netting around the driving range from the existing 115 feet to a proposed 140 feet, and new lighting for the driving range to be mounted at a height of 90 feet.

According to information in the project file:

"The golf course operation currently employs 25 people and will employ 25 after project is complete. The golf course averages about 56,000 annual rounds played on the 18 hole course, and 16,000 annual rounds played on the 9 hole course. This equates to 200 players per day on average for the facility. In addition the driving range averages approximately 120 patrons per day, and about 25 % of those overlap with the playing golfers. There is also a food service operation with seating for 30 patronized mostly by golfers. In addition there is a small banquet room with a capacity of 48. Therefore the average total number of patrons using the clubhouse, restaurant, and driving range facilities daily is expected to average 270 to 280. The average length of stay is 5-6 hours.

In addition to operating the driving range and golf course out of the proposed new facilities, a youth learning center will be provided. First Tee of Greater Seattle operates out of the existing clubhouse, and will continue to operate out of the new facilities. First Tee is a program dedicated to teaching youth the game of golf. The mission as stated on their website is: 'To impact the lives of young people by providing educational programs that build character, instill life-enhancing values, and promote healthy choices through the game of golf.'

There are on average approximately 60 youth enrolled in First Tee programs at Jefferson Park Golf Course.

Typical hours of operation at Jefferson Park Golf Course are from sunrise to sunset for the golf course, and from sunrise to 10:00 PM for the driving range. The restaurant hours of operation closely follow the golf course, opening shortly after sunrise and closing just after sunset on most days. There may be occasional events or promotions where the food service operation would be open until 9 PM, especially in the summer months.

The proposal includes an enlarged restaurant and expanded banquet operation. The proposed restaurant will seat 40-44 at indoor tables and 6-8 at a new bar counter. The proposed banquet capacity would be increased from 48 to 150. This increase in size will allow a typical full course tournament (144 players) to be serviced on site. The banquet facility will be sub-dividable to allow two smaller groups to meet as well. This may increase the overall frequency of the facility uses beyond the golf patrons to include community meetings such as Rotary, Kiwanis, and other gatherings."

The proposal will meet all applicable development standards in Single Family zones with the exception of four items for which Council modifications are requested (SMC Sections 23.44.036 and 23.51A.002). These four items include the following requests:

- 1) to allow additional height for driving range lighting in a single-family zone (30 feet required, 90 feet maximum proposed);
- 2) to allow additional height for driving range nets and netting poles in a single-family zone (30 feet required, 140 feet maximum proposed);
- 3) to allow an existing driveway to remain at less than the required width (22 feet required, 17'-11" proposed); and
- 4) to allow an existing curbcut to remain at greater than the required width (25 feet required, 38'-5" proposed).

These requests for Council to waive or modify development standards will be discussed in more detail, below.

### Public Comments

DPD provided public notice of the proposal on March 1, 2012. That public comment period was extended to March 28, 2012, by request. Public comments were received from about twenty individuals. People whose questions or comments were focused on design issues were referred to the Seattle Design Commission's website for more information.

### Seattle Parks and Recreation Public Outreach

The Seattle Parks Department has provided the following information about their public outreach efforts and resulting public comments:

Seattle Parks and Recreation conducted public outreach for the update of the 1991 Golf Course Master Plan and 2005 Economic Analysis for all four municipal golf courses. Meetings took place at each golf course in early December 2008. In January 2009 a briefing and public hearing took place at the Park Board of Commissioners.

The public involvement process included working directly with Seattle Parks and Recreation Golf Steering Committee (a citizen advisory group), conducting four public open houses and outreach to the general public. The Committee is comprised of citizens with interest in each of the four golf courses who provided in-depth course-specific input. The Committee members also reviewed and provided input on the proposals as a group.

Parks and the design team hosted an open house at each golf course to present draft concepts, options and proposals. Community concerns included safety and security, parking and traffic, appearance of course edges, clubhouse rehabilitation or replacement, new driving ranges and joint use of clubhouses. Outreach email notification and distribution was sent out through Premier Golf (Parks operating partner), the Department of Neighborhoods Service Centers, District Councils, Parks Community Centers and advisory councils, along with press releases to Parks media lists. Information about the Golf Master Plan was also added to the Parks Department website.

Public outreach and involvement also occurred with regard to the specific Jefferson Park capital improvements. Two public meetings were held for the capital projects in October and December 2011. Public notice was posted on-site three weeks prior to the October meeting and again in December for the SEPA public comment period which ended January 6, 2012. The Parks Department indicates that they received no public comments during the SEPA comment period and the DNS was issued in January 2012.

Parks Department staff followed Parks' public involvement policy for the public meetings, which included over 3000 postcards mailed to area residents surrounding the Jefferson golf course, flyers distributed to branch libraries and Department of Neighborhoods Business Service Center. Emails were sent to people who had signed in during previous Golf Master Plan and Jefferson Park meetings. Information about the meetings and public comments were posted on the Parks Department's project webpage immediately following the meetings.

Project briefings were also held at Friends of Seattle Olmstead Parks, the Preservation Board, Design Commission and the North Beacon Hill Council. These meetings were open to the public. Parks staff and the design team gathered public comments during the meetings and via questionnaires. They provided approximately fifty responses to comments from individual community members and responded to a public disclosure request.

The Parks Department summarizes the public comments they received as follows:

"The majority of public comments received revolved around parking issues along Beacon Ave. Additional comments included the desire for a two-story clubhouse with a café and banquet room that is open to the general public, better visibility to and from Beacon Ave of the clubhouse, better connections to the ProParks pathway, the desire to have facilities open as much as possible during construction, and the sizes of the new putting greens. All agree that the current driving range light configuration creates too much glare and reconfiguration of these would be a huge improvement, the desire was also expressed that the driving range netting needs to be higher."

## **I. ANALYSIS —COUNCIL CONCEPT APPROVAL**

Public parks are City facilities permitted outright in SF 5000 zones. Development standards for single family zones are found in Seattle Municipal Code (SMC) Chapter 23.44. SMC 23.76.064 includes provisions for the City Council to waive or modify applicable development standards, accessory use requirements, special use requirements or conditional use criteria for City facilities. The Seattle Parks Department seeks a Council Concept Approval under SMC 23.76.064 to modify four development standards, as follows:

**Table A**

<b>Development Standard</b>	<b>Requirement</b>	<b>Proposal</b>	<b>Modification</b>
Allow height of field lighting to exceed limit  SMC 23.44.012	30 foot height limit	90 feet	Exceed height limit by 60 feet
Allow height of netting for driving range to exceed limit  SMC 23.44.012	30 foot height limit	140 feet	Exceed height limit by 110 feet
Allow an existing driveway to remain less than the minimum width required.  SMC 23.54.030.D.2	22 feet	17 feet 11 inches	Retain existing 4 feet 1 inch reduced width

Allow an existing curbcut to remain greater than the maximum allowed  SMC 23.54.030.F.2.b	25 feet	38 feet 5 inches	Retain existing 13 feet 5 inch additional width
---	---------	------------------	---

SMC 23.76.050 requires the DPD Director to prepare a written report on Type V application, which includes the following analysis and information:

***1. The written recommendations or comments of any affected City departments and other governmental agencies having an interest in the application;***

**Seattle Parks and Recreation Department** - Seattle Parks and Recreation published a DNS on December 21, 2011, which analyzed the probable impacts of the proposal and determined that none of the impacts were significant or warranted additional mitigation.

**Federal Aviation Administration** - The Parks Department obtained a *Determination of No Hazard to Air Navigation* for 35 structures described as “Driving Range Pole/Nets” for the subject site. The six page FAA determination describes the project they reviewed as follows: “The proposal is to increase the net pole height of an existing Seattle Parks Dept Golf Course and Driving Range Facility on Beacon Hill at Jefferson Park. The proposed 35 structures are for the net poles.” The 140-foot height of the net poles is described. However, nowhere in the FAA Determination is the proposed lighting at 90 feet above grade discussed.

DPD recommends that a revised FAA *Determination of No Hazard to Air Navigation* that includes an analysis of the proposed lighting be obtained prior to issuance of any building permits that include lighting over the height limit.

**City of Seattle Preliminary Assessment Report (PAR)** - The MUP application was reviewed through the preliminary assessment process by the following city departments: Department of Planning and Development (DPD, Site Team, Drainage and Land Use), Seattle Department of Transportation (SDOT), Seattle City Light (SCL), and Seattle Public Utilities (SPU). This process is intended to give applicants an early, preliminary review of issues which may affect their project.

The **Seattle City Light** comments for this project include the following:

- There are underground high voltage lines and electrical facilities in the area. Before digging contact the Utilities Underground Location Center (“One-Call”) at 1-800-424-5555 two business days in advance to locate and mark underground utilities, per State law (RCW 19.122).
- New construction appears to be over or near an existing below-grade vault. Relocating the SCL vault, transformer and conduit may be required. Access and fire safety clearances to SCL facilities must be maintained.

The **DPD** comments include the following:

- ECA Exemption Note: The proposed construction is in the vicinity of the existing clubhouse, which is not close to Steep Slope Critical Areas nor wetlands. No documented landslides are in the vicinity of the clubhouse. Treat this project as a non-Environmentally Critical Area site.

**Seattle Design Commission** – The Seattle Design Commission reviewed the Jefferson Park Golf Course Facility Improvement at their meetings on October 20, 2011 and February 2, 2012. The project team was invited back for a follow-up presentation. However, both Parks staff and Design Commission staff have confirmed that a follow-up presentation did not occur due to scheduling conflicts. The notes regarding the Design Commission’s action item from the February 2, 2012 meeting are found below:

“ACTION

The Commission thanked the design team for its presentation for the design development of Jefferson Park Golf Course Facility Improvements. The commission believed the design and site plan had improved from its previous review. By a vote of 6-2, the commission approved the design development, with the following comments:

- ☐ More explicitly express in the design the history and culture of minority participation in golf as well as the unique qualities of Jefferson Park. The design feels generic. Though the commission appreciates contemporary architecture, consider making reference in the design to the cultural history and/or neighborhood context through materials, surfaces, shapes of windows, spaces, or other creative means. This would go beyond displaying historic photographs on the wall or artifacts in cases.
- ☐ Create a better sense of entry to the facility from Beacon Ave. and better integrate the building and other improvements into the larger park. The lack of connections is a lost opportunity.
- ☐ Remove the parking lot parallel to Beacon Ave. until parking needs can be more fully evaluated to prove that additional parking on park property is necessary. The recent restriction of 6 hour parking limits on Beacon Ave. and the prospect of a Veterans Administration hospital parking garage may alleviate the need for more parking.
- ☐ Be more ambitious in the pursuit of sustainability goals. Go for LEED gold and move even further toward the establishment and operation of a natural golf course. Make these aspirations and achievements clear to golf course and park visitors. It is disappointing that the sustainable features, such as ground-source heat pump, will not be developed due to budget constraints.
- ☐ Reinforce the parti in the execution of the design. Make more distinct where the masses meet the driving range bar.
- ☐ Explore use of more transparency, especially in the driving range wall. More transparency could improve the building’s energy performance and aesthetics.
- ☐ Consider providing raincover for some of the outdoor spaces.

The Commission requested the team return for another review. At the next review, the Commission asked for perspectives from the (Pro Parks) pathway to the west and from Beacon Ave to the east. Also, the Commission asked for more information and graphics about the cart barn’s design.

Commissioner Sato voted no because there remained too many unanswered questions about the design. One area of special concern is its lack of relationship to the community and history of the golfers and golf course and connection to the culture of Beacon Hill.

Commissioner Loew voted no because the sustainability aspirations were not bold enough, the connections to community were not clear, and the prevalence of non-right angles in the building’s design unnecessarily added to the construction costs.”

As noted above, due to scheduling constraints the Parks Department and the project team did not return to the Design Commission for another presentation. However, in response to a DPD correction notice they provided a Memorandum dated May 4, 2012 detailing how the project design addresses the Design Commission's comments. That memorandum is attached as Attachment A.

**2. *Responses to written comments submitted by interested citizens;***

Please see the discussion under 'Public Comments' and 'Seattle Parks and Recreation Public Outreach' above.

**3. *An evaluation of the proposal based on the standards and criteria for the approval sought and consistency with applicable City policies;***

Seattle Municipal Code (SMC) Chapter 23.44 includes standards and criteria for proposed development in Single Family zones. SMC Chapter 23.54 includes standards for driveways and curbscuts (including those located in Single Family zones). Public parks are a permitted use in Single Family zones. The project meets all applicable development standards for Single Family zones with the exception of those described in Table A, above. Table A shows the code standard and the Parks proposal for each of the four requested modifications. Each of the requested development standard modifications is discussed below:

**A) *Lighting Height***

The proposal includes new field lighting on existing and proposed new poles at the driving range at heights to a maximum of 90 feet; 30 feet is the height limit under the code. The lights to be added for the illumination of the driving range will be 'sports field' type floodlights typical for use at exterior athletic fields. The floodlights will be installed atop six (6) existing net poles and on two (2) new 60-foot light poles at the tee area. General purpose, lower intensity lighting will also be installed closer to the ground.

The Parks Department indicates that the proposed lighting is to allow driving range use and access during both daylight and evening hours. They are not proposing to increase the hours of operation for the driving range. The lights would be turned on approximately one hour before sunset and be turned off within 15 minutes after the close of the driving range, daily. Security lights will be turned off no later than 30 minutes after the close of the driving range and restaurant business.

According to information provided by the Parks Department:

"The proposed lights will reduce spill light and glare to surrounding properties compared to shorter poles providing the same level and coverage of illumination. Taller poles allow fewer poles and lights to be aimed more vertically (down) to the ground, preventing spill light and glare. Lower mounting of lights require more light poles and lights to be aimed more horizontally, increasing the amount of spill light and glare. Each field light will have hooded cover designed to prevent spill light and glare. The shielding capacity of the proposed hoods will meet or exceed most of those installed on City of Seattle playfields. The lights are proposed to be installed a significant distance away from the property lines, except along Beacon Avenue. The poles closest to neighboring houses are each approximately 1000 feet away from each of these houses and most houses are between 1200 and 1300 feet away. The proposed lighting will be installed adjacent to Beacon Avenue, a busy arterial with street lighting currently in place."



In support of the request for lighting at 90 feet, the Parks Department provided diagrams illustrating the existing and proposed lighting at the driving range. These diagrams are attached as Attachment B.

In addition to the height limit requirement (SMC 23.44.012) the Land Use Code also includes the following standard for uses permitted outright: "Exterior lighting shall be shielded and directed away from residentially zoned lots. The Director may require that the intensity of illumination be limited and that the location of the lighting be changed."

The Land Use Code has been developed in accordance with Comprehensive Plan policies. The development standard to reduce light and glare in SMC 23.44.008.H is a requirement that relates to Policy LU47. Policy LU47 requires, "Establish controls on the direction and maximum height of lighting, and the glare from reflective materials used on the exterior of structures. The intent of this policy is to provide for the illumination of structures, parking areas, recreation areas and outdoor storage areas, while limiting light and glare on surrounding uses, enhancing the urban character of the city, and encouraging energy conservation."

As noted above, the proposed lights are designed and to minimize light and glare to adjacent residences, and will be shielded.

DPD recommends approval of the requested modification to development standards to allow lighting up to 90 feet in height, subject to a requirement that the Parks Department obtain a revised FAA *Determination of No Hazard to Air Navigation* that includes an analysis of the proposed lighting be obtained prior to issuance of any building permits that include lighting over the height limit (as discussed above).

#### ***B) Netting and Netting Pole Height***

The proposal includes netting and netting poles up to 140 feet (110 feet higher than the code would allow). According to information submitted by the Parks Department:

"The proposed increase in netting height is necessary to minimize the number of golf balls exiting the driving range following the addition of a second level of hitting stations. As a result of modern golf equipment technology golfers are hitting the ball higher and further than in years past. The proposed second level of the driving range tee structure will increase the likelihood of balls escaping the netting unless additional net height is installed."

To support the requested increase in pole height, the Parks Department submitted the Jefferson Park Ball Flight Study (prepared by Bassetti Architects 10/12/2011). The Jefferson Park Ball Flight Study is attached as Attachment C.

According to the Study (page 4), a "random, fast swinging inaccurate player" would hit 54 out of 1166 (4.6%) shots with an apex over 115 feet in height (the existing net height). Given the proximity of the driving range to Beacon Ave. S., a busy arterial, this presents a potential safety hazard to passing vehicles as well as pedestrians and other park users.

The Land Use Code has been developed in accordance with Comprehensive Plan policies. Regarding height limits in single family zones, the Comprehensive Plan policy LU70 requires, "Establish height limitations in single-family residential areas that establish predictable maximum heights, maintain a consistent height limit throughout the building envelope, maintain the scale relationship between a structure and its site, address varying topographic conditions, control view blockage and encourage pitched roofs."

The height limitation of 30 feet is appropriate for most structures in single family zones and is most consistent with the Comprehensive Plan when applied to residential or institutional

structures typically found in single family zones and the pattern of development resulting from relatively small lots. However, as noted above, the poles closest to neighboring houses are each approximately 1000 feet away from each of these houses and most houses are between 1200 and 1300 feet away. Parks has also indicated that the taller net poles and nets will be made of the most transparent material available for the purpose, which matches the existing material. The distance from the nearest residences and the use of the most transparent material available both serve to mitigate the affect of the taller poles and netting so that the proposal is not inconsistent with the applicable Comprehensive Plan policies.

DPD recommends approval of this requested modification to development standards to allow nets and net poles of up to 140 feet in height.

***C) Existing Driveway Less than the Required Width***

The existing driveway accessing the site along the west side of Beacon Ave S. is 17'-11" wide; the Land Use Code would require 22 feet. The Parks Department is requesting a modification to the development standard to allow the existing driveway to remain unchanged. According the Parks Department, the drive is currently used as a service road to provide limited public access to the Jefferson Park Golf Course maintenance facility, the City Horticultural Center, and the Lawn Bowling clubhouse and bowling lawns. In addition the road is used to access 13 parking spaces to the immediate west of the golf clubhouse (reduced to 9 under the proposal) and provide service access for deliveries and pick-ups for the Golf clubhouse operations. It is used primarily by the maintenance staff of Jefferson Park, the staff of the Horticultural building, and the public users of the Bowling Clubhouse and greens, along with the parking spaces behind the golf clubhouse. It is not a through road from Beacon Ave to 16<sup>th</sup> Ave South. Parks gates off access to the Horticultural center to encourage public access to that facility from 16<sup>th</sup> Ave South. Existing uses accessed from the drive will remain.

The existing driveway will also provide access to the proposed 63-space parking lot along Beacon Ave. S. Initially, the existing curbcut and driveway was the sole access to the proposed parking lot. However, the plans submitted on June 28, 2012 (Sheet G0.3) show an additional access point (with a new curbcut and driveway) to the proposed new parking spaces from Beacon Ave S. The new access point is located approximately 240 feet south of the existing driveway, and meets current code standards with regard to curbcut and driveway width.

Comprehensive Plan Policy LU154 states: "Maintain minimum and maximum standards for curbcuts and street driveways in order to balance the need to provide adequate maneuvering and loading areas with the goal of maintaining some on-street parking and safe pedestrian access."

The Parks Department has not reported any safety issues or maneuvering difficulties with the existing driveway that they wish to maintain. Visitors to the facility who choose to utilize the proposed new parking area will have the option of using the new, conforming driveway.

DPD recommends approval of the modification to allow the undersized driveway to remain, subject to a requirement that the additional access to the new parking area shown on the June 28, 2012 plans (Sheet G0.3) be provided.

***D) Existing Curbcut Greater than the Required Width***

The curbcut leading to the existing driveway described at No. 3, above, is 38 feet 5 inches wide; 25 feet is the maximum allowed by code. The Parks Department is requesting a modification to the development standard to allow the existing curbcut to remain unchanged.

According to the Parks Department, the curbcut access is used for trucks and passenger vehicles, along with golf course maintenance equipment, including trucks with trailers. They state that the existing dimension is required for turning radius requirements for Parks maintenance equipment and delivery vehicles making turns into and out of this service drive from Beacon Avenue. SMC 23.54.030.F.2.b. 2 provides that the maximum width of curbcut may be increased to 30' if truck and auto access are combined. Further, Parks maintains that the driveway turning radius is constrained by an existing parking aisle on the west side of the Beacon Avenue ROW.

As noted above, Policy LU154 requires that minimum and maximum standards for curbcuts and street driveways are established in order to: “ balance the need to provide adequate maneuvering and loading areas with the goal of maintaining some on-street parking and safe pedestrian access.”

Generally, the code requires existing nonconforming curbcuts that are associated with sites undergoing development be brought into conformance with current code. However, policies regarding wide curbcuts are related to the impact on potentially scarce on-street parking availability and/or pedestrian safety. Given the ample on-street parking available along Beacon Ave. S. (in the median), impacts on parking supply are not an issue. In addition, Beacon Ave. S. at this location is not a high traffic area for pedestrians and the additional 8'-5" of curbcut width should not present a safety hazard for pedestrians.

DPD recommends approval of the modification to allow the wide curbcut to remain at 38 feet 5 inches.

***4. All environmental documentation, including any checklist, EIS or DNS;***

Seattle Parks and Recreation published their DNS for the project on December 21, 2011, as described above. Environmental documentation associated with the DNS includes the Light Spill Diagrams and Jefferson Park Ball Flight Study which are cited above and attached as Attachments B and C of this report.

***5. The Director's recommendation to approve, approve with conditions, or deny a proposal.***

Based on the analysis provided, above, DPD recommends the following:

- A. DPD recommends **approval with conditions** of the requested modification to development standards to allow lighting up to 90 feet in height, subject to a requirement that the Parks Department obtain a revised FAA *Determination of No Hazard to Air Navigation* that includes an analysis of the proposed lighting be obtained prior to issuance of any building permits that include lighting over the height limit.
- B. DPD recommends **approval** of the requested modification to development standards to allow nets and net poles of up to 140 feet in height.

- C. DPD recommends **approval** of the modification to allow the undersized driveway to remain, subject to a requirement that the additional access to the proposed new parking area shown on the June 28, 2012 (Sheet G0.3) be provided.
- D. DPD recommends **approval** of the modification to allow the wide curbcut to remain at 38 feet 5 inches.

## **II. SPECIAL EXCEPTION FOR AIRPORT HEIGHT OVERLAY DISTRICT (SMC 23.64.010)**

The Director may permit a structure to exceed the limits of the Airport Height Overlay District as a special exception pursuant to Chapter 23.76, Procedures for Master Use Permits and Council Land Use Decisions. Because the Special Exception is part of a Council Land Use Decision, DPD is making a recommendation to Council. A Special Exception shall only be permitted if the Director finds that all of the following conditions exist:

- A. The Federal Aviation Administration advises the Director that the exception to the height limits does not create a hazard to aviation.***

The Federal Aviation Administration provided a *Determination of No Hazard to Air Navigation* for all the proposed driving range poles and nets on April 13, 2012. The FAA referenced Aeronautical Study numbers 2012-ANM-712-OE and 2012-ANM-116. The proposal meets this criterion.

- B. The additional height is necessary for the successful physical function of the structure.***

Seattle Parks and Recreation has demonstrated that the additional height is necessary for the successful function of the driving range to reduce light spillage and glare and the occurrence of golf ball “trespass” (i.e., ball flight exceeding the net height). The proposal meets this criterion.

- C. The exception will not result in re-routing of aircraft.***

The FAA *Determination of No Hazard to Air Navigation* notes that the proposal would have no substantial adverse effect on the safe and efficient utilization of the navigable airspace by aircraft. The proposal meets this criterion.

- D. The structure is designed to minimize adverse impacts of lighting on surrounding uses while complying with the lighting requirements of the Federal Aviation Administration.***

Seattle Parks and Recreation has designed the proposal to minimize adverse impacts of light spillage and glare, as described in the Council Concept Approval Analysis above. However, as noted above, the FAA *Determination of No Hazard to Air Navigation* includes no specific discussion of lighting. Subject to a requirement that the Parks Department provide a revised FAA *Determination of No Hazard to Air Navigation* that includes an analysis of the proposed lighting prior to issuance of any building permits that include lighting over the height limit, the proposal meets this criterion.

### **RECOMMENDATION - SPECIAL EXCEPTION**

Based on the information provided to both DPD and the FAA and the *Determination of No Hazard to Air Navigation*, DPD recommends that the Special Exception is **be conditionally granted** (recommended conditions follow SEPA analysis).

### **III. ANALYSIS – STATE ENVIRONMENTAL POLICY ACT (SEPA)**

On December 21, 2012, Seattle Parks and Recreation published a Determination of Non-Significance for the Jefferson Park Golf Capital Improvements proposal. Project specific environmental impacts of the improvements have been disclosed and analyzed in the documents provided by Seattle Parks and Recreation, acting as Lead Agency.

The Seattle SEPA Ordinance provides substantive authority to require mitigation of adverse environmental impacts resulting from a proposed project (SMC 25.05.655 and 25.05.660). Mitigation, when required, must be related to specific environmental impacts identified in an environmental document and may only be imposed to the extent that a given impact is attributable to a proposal, and to the extent that the mitigation is reasonable and capable of being accomplished. Additionally, mitigation may be imposed only when based on policies, plans and regulations referenced in SMC 25.05.665 to SMC 25.05.675 inclusive (SEPA Overview Policy, SEPA Cumulative Impacts Policy, SEPA Specific Environmental Policies). In some instances, local, state or federal regulatory requirements will provide sufficient mitigation of an impact and additional mitigation imposed through SEPA may not be necessary.

#### **Short-term Impacts**

The following temporary construction-related impacts are expected and were described in the DNS: 1) decreased air quality due to increased dust and other suspended particulates from building activities; 2) increased noise and vibration from construction operations and equipment; 3) increased traffic and parking demand from construction personnel; 4) blockage of streets by construction vehicles/activities; 5) conflict with normal pedestrian movement adjacent to the site; 6) consumption of renewable and non-renewable resources; and 7) displaced recreation users. Although not significant, the impacts are adverse and mitigation measures are appropriate as specified below.

City codes and/or ordinances apply to the proposal and will provide mitigation for some of the identified impacts. Specifically, these are: 1) The Stormwater, Grading and Drainage Control Code that requires soil erosion control techniques; 2) Street Use Ordinance (watering streets to suppress dust, obstruction of the pedestrian right-of-way during construction, construction along the street right-of-way, and sidewalk repair); 3) Building Code (construction measures in general); and 4) The Noise Ordinance to regulate the time and amount of construction noise permitted in the City. Compliance with these applicable codes and ordinances will be adequate to achieve sufficient mitigation and further mitigation by imposing specific conditions is not necessary for these impacts.

#### **Construction**

Construction traffic is listed as a short term potential impact. The DNS notes that there are adequate areas on-site for construction crews and equipment. The site is adjacent to Beacon Ave. S., an arterial with direct access to Highway 99 and Interstate 5 via South Spokane St., which provides convenient truck access. Approximately 600 truck trips would be required for the proposal. According to the DNS, recent (2010) data from the Seattle Department of Transportation notes that there are 11,800 Average Annual Daily Traffic (AADT) trips on Beacon Ave S. Given the existing volumes, the additional 600 truck trips over the duration of the project are not considered significant. The DNS indicates that construction traffic and haul routes will be designated, and notices and signage will be used to alert pedestrians and drivers to times of day when peak activities are expected to occur. No further mitigation is warranted.

### Recreation

The DNS describes potential short term impacts to recreation users to include temporary displacement of activity at the existing driving range during construction. Temporary facilities will be provided at the driving range “for as long as safety allows.” The DNS also indicates that the cart barn will be used as a temporary club house facility until the new club house is built. No impacts to the 18-hole golf course are anticipated. The 9-hole golf course may be disrupted by construction staging and parking expansion, and will be reconfigured as part of the proposal. The golf courses and driving range will be open for “as much of the construction as possible” according to the DNS. Impacts to recreational users are anticipated to be minor and of short duration. No mitigation is necessary or warranted.

### Historic Preservation

The existing golf club house was built in 1935 by the Works Progress Administration. The Parks Department submitted a nomination application to the City of Seattle’s Landmark Preservation Board, as part of this MUP application process. The project was presented to the Board at their February 15, 2012 meeting. The Board voted on a motion to nominate the clubhouse as a Seattle Landmark, the motion failed, and the clubhouse was denied nomination as a City Landmark.

### Long-term Impacts

The SEPA Checklist prepared by The Seattle Parks and Recreation states, at Item No. 10. Aesthetics: “The net poles surrounding the range will be increased from 90’ to 115’ and 115’ to 140’ respectively. The higher netting, though fairly transparent may alter views to the sky when viewed from the street. The most transparent netting available will be used at the driving range along with transparent glass panels in the tee stations greatly allowing for views of downtown Seattle that are currently blocked.”

The SEPA checklist also states, at Item 11. Light and Glare: Lighting at the driving range will be greatly enhanced with the new design, replacing the old fixtures with ones that reduce night spill and glare, and are less obtrusive to park users and passers-by.”

The DNS prepared by Parks states: “Upon completion of the project, no long term adverse environmental impacts are anticipated and thus no conditioning is necessary or warranted.”

### Summary

In conclusion, several impacts to the environment would result from the proposed development. However, the conditions are not significantly adverse, and no mitigation is warranted.

### **RECOMMENDED CONDITION(S) – SEPA**

None

**RECOMMENDED CONDITION(S) – COUNCIL CONCEPT APPROVAL**

1. A revised FAA *Determination of No Hazard to Air Navigation* that includes an analysis of the proposed lighting must be obtained prior to issuance of any building permits that include lighting over the height limit.
2. The undersized driveway will be allowed to remain, subject to a requirement that the additional access to the proposed new parking area shown on the June 28, 2012 plans (Sheet G0.3) be provided.

**RECOMMENDED CONDITION(S) – SPECIAL EXCEPTION FOR AIRPORT OVERLAY  
HEIGHT DISTRICT**

3. A revised FAA *Determination of No Hazard to Air Navigation* that includes an analysis of the proposed lighting must be obtained prior to issuance of any building permits that include lighting over the height limit.

Signature: \_\_\_\_\_ (signature on file) Date: August 9, 2012  
Molly Hurley, Senior Land Use Planner  
Department of Planning and Development

MMH/drm

I:\Hurley\2012 MUPS\3012845final (2).docx